

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
SquareTwo Financial Services : Case No. 17-_____ ()
Corporation, et al.,¹ :
: (Joint Administration Pending)
Debtors. :
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**DECLARATION IN SUPPORT OF EMPLOYMENT
AND RETENTION OF FEDERATED LAW GROUP, PLLC
AS A COLLECTIONS FIRM**

I, Bryan Manno, declare as follows:

1. I am a Managing Member of the firm Federated Law Group, PLLC (the “Firm”), which has been employed by the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”) in the ordinary course of their business. I am authorized to provide this Declaration on behalf of the Firm. The information contained herein is based on my knowledge or the knowledge of people that work under my supervision. The Debtors wish to employ and retain the Firm to continue providing such collections services during their chapter 11 cases. This Declaration is submitted in support of the employment and retention of the Firm by the Debtors, nunc pro tunc to the Petition Date.²

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor’s federal taxpayer identification number and/or Canadian equivalent are as follows: Astrum Financial, LLC (2265); Autus, LLC (2736); CA Internet Marketing, LLC (7434); CACH, LLC d/b/a Fresh View Funding (6162); CACV of Colorado, LLC (3409); CACV of New Jersey, LLC (3499); Candeo, LLC (2809); CCL Financial Inc. (7548); Collect Air, LLC (7987); Collect America of Canada, LLC (7137); Healthcare Funding Solutions, LLC (2985); Metropolitan Legal Administration Services, Inc. (6811); Orsa, LLC (2864); Preferred Credit Resources Limited (0637); ReFinance America, Ltd. (4359); SquareTwo Financial Canada Corporation (EIN: 1034; BN: 0174); SquareTwo Financial Corporation (1849); and SquareTwo Financial Services Corporation d/b/a Fresh View Solutions (5554). The Debtors’ executive headquarters are located at 6300 South Syracuse Way, Suite 300, Centennial, CO 80111.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the proposed interim order attached as Exhibit A to the Debtors’ Motion for Interim and Final Orders Authorizing Debtors to (A) Continue Using Their Existing Collections System; (B) Employ and Retain Certain Related

2. Neither I, the Firm, nor any member, counsel or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, or any party in interest herein, except as set forth hereinafter:

(a) The Firm has begun discussions and is in the process of developing a business relationship with Sherman Capital Markets, LLC/Resurgent Holdings, LLC, the proposed Plan Investor, to provide collection services for said companies if the Plan is confirmed or goes effective.

3. The Firm does not represent or hold any interest adverse to the Debtors or their estates with respect to the engagement for which it is to be retained.

4. This Firm and certain of its members, counsel, and associates may have in the past represented, currently represent and may in the future represent entities that are claimants or equity security holders of the Debtors in matters unrelated to the Debtors' chapter 11 cases. None of those past or current representations are material.

5. The Firm is paid on a commission basis by Advisory Group Reliance Recovery, LLC, plus reimbursement of expenses. In addition, the Debtors directly pay the firm any attorneys' fees and costs awarded by courts in favor of the Debtors. As of the Petition Date, the Firm held a retainer of approximately \$500.00 in attorney fees subject to off-set against the retainer being held between the parties and approximately \$580,000.00 in Trust Account costs. The Firm intends to apply such retainer to any unpaid prepetition fees and expenses. The Firm intends to apply for compensation for professional services rendered during the ordinary course of business and reimbursement of expenses directly to the Debtors through the continuation of the Debtors' prepetition practice.

Law Firms in the Ordinary Course of Business Nunc Pro Tunc to the Petition Date; and (C) Granting Related Relief (the "**Collections Professionals Order**"), filed concurrently herewith.

6. Except as provided in the Collections Professionals Order, no representations or promises have been received by the Firm as to compensation in connection with these cases other than in accordance with the provisions of the Bankruptcy Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm.

[The remainder of this page is intentionally left blank.]

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 19, 2017

/s/ Bryan Manno
Bryan Manno
Managing Partner/Attorney
887 Donald Ross Road
Juno Beach, Florida 33408

Collections Firm Questionnaire

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re: : Chapter 11
:
SquareTwo Financial Services : Case No. 17-_____ ()
Corporation, et al.,¹ :
: (Jointly Administered)
Debtors. :
-----X

COLLECTIONS FIRM QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY ANY ENTITY IN THE
ABOVE-CAPTIONED CASES (collectively, the "Debtors"):

If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

Federated Law Group, PLLC

887 Donald Ross Road

Juno Beach, Florida 33408

2. Date of retention: May 2012

3. Type of services provided:

Collections for Florida, Georgia, Louisiana, New Jersey, Puerto Rico

and Tennessee.

4. Brief description of services to be provided:

Files are placed into the office for collection and suit. Lawsuits are filed. Judgments are obtained and efforts are made in all stages of pre-litigation, litigation and post-litigation to collect the monies owed to

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the client.

5. Prepetition claims against any of the Debtors held by the firm:
Amount of Claim: \$500.00 in anticipated attorney fees subject to setoff based on the retainer between the parties
Date claim arose: March 15, 2017 through March 19, 2017
Source of Claim: Litigation – professional collection services

6. Prepetition claims against any of the Debtors held individually by any member, associate, or professional employee of the firm:
Name: N/A
Status: N/A
Amount of Claim: \$ N/A
Date claim arose: N/A
Source of claim: N/A

7. Disclose the nature, and provide a brief description, of any interest adverse to the Debtors or to their estates respecting the matters on which the above-named firm is to be employed.
N/A
